

EXHIBIT 1

From: [Yung, Eva H.](#)
To: [Henningson, Sven E. \(Trip\)](#); [Maier, Eric J.](#); [Thorne, John](#); [Bird, Daniel G.](#); [Goodnow, Christopher C.](#); [Sherrerd, Devon L.](#)
Cc: [Haws, Claire L.](#); [Reiser, Craig M.](#); [Yung, Eva H.](#); [Boisvert, Caroline P.](#)
Subject: [EXTERNAL] RE: Daily Mail v. Google -- MDL
Date: Friday, November 17, 2023 1:39:41 PM
Attachments: [image001.png](#)
[AxinnLogo_eb86e062-85ba-4da5-903a-7a60628f62291111.png](#)
[2023 1117 Google's Proposed Search Terms and Custodians to Daily Mail.pdf](#)

Counsel,

Further to our November 10, 2023 letter, please see proposed search strings and custodians for searches of electronically stored information. Please let us know if this list is acceptable as soon as possible and in all events by November 29, 2023. We would also be happy to schedule a call to discuss, if helpful—please propose times if so.

Yours,

Eva

Eva H. Yung

Associate



Axinn, Veltrop & Harkrider LLP
114 West 47th Street
New York, New York 10036
Office 212.728.2235
Fax 212.728.2201
eyung@axinn.com
Axinn.com

From: Boisvert, Caroline P. <cboisvert@axinn.com>
Sent: Friday, November 10, 2023 2:58 PM
To: Henningson, Sven E. (Trip) <shenningson@kelloggghansen.com>; Maier, Eric J. <emaier@kelloggghansen.com>; Thorne, John <jthorne@kelloggghansen.com>; Bird, Daniel G. <dbird@kelloggghansen.com>; Goodnow, Christopher C. <cgoodnow@kelloggghansen.com>; Sherrerd, Devon L. <dsherrerd@kelloggghansen.com>
Cc: Yung, Eva H. <eyung@axinn.com>; Haws, Claire L. <chaws@axinn.com>; Reiser, Craig M. <creiser@axinn.com>
Subject: RE: Daily Mail v. Google -- MDL

Counsel:

Please see attached correspondence.

Best,
Caroline

Caroline P. Boisvert
Associate



Axinn, Veltrop & Harkrider LLP
90 State House Square
Hartford, CT 06103
Office 860.275.8129
Mobile 860.856.3019
Fax 860.275.8101
cboisvert@axinn.com
Axinn.com

Pronouns | She, Her, Hers

From: Boisvert, Caroline P.
Sent: Tuesday, October 31, 2023 10:58 AM
To: 'Henningson, Sven E. (Trip)' <shenningson@kellogghansen.com>; Maier, Eric J. <emaier@kellogghansen.com>; Thorne, John <jthorne@kellogghansen.com>; Bird, Daniel G. <dbird@kellogghansen.com>; Goodnow, Christopher C. <cgoodnow@kellogghansen.com>; Sherrerd, Devon L. <ds herrerd@kellogghansen.com>
Cc: Yung, Eva H. <eyung@axinn.com>; Haws, Claire L. <chaws@axinn.com>; Reiser, Craig M. <creiser@axinn.com>
Subject: RE: Daily Mail v. Google -- MDL

Thanks, Trip. I will send a calendar invite for Nov. 6 at 3pm.

Best,
Caroline

From: Henningson, Sven E. (Trip) <shenningson@kellogghansen.com>
Sent: Monday, October 30, 2023 10:33 PM
To: Boisvert, Caroline P. <cboisvert@axinn.com>; Maier, Eric J. <emaier@kellogghansen.com>; Thorne, John <jthorne@kellogghansen.com>; Bird, Daniel G. <dbird@kellogghansen.com>; Goodnow, Christopher C. <cgoodnow@kellogghansen.com>; Sherrerd, Devon L. <ds herrerd@kellogghansen.com>
Cc: Yung, Eva H. <eyung@axinn.com>; Haws, Claire L. <chaws@axinn.com>; Reiser, Craig M. <creiser@axinn.com>
Subject: RE: Daily Mail v. Google -- MDL

Caution: External Email

Caroline,

Each of the times proposed — Nov. 6 at 11:30am, Nov. 6 at 3pm, Nov. 7 at 10am, and Nov. 7 at 1pm — would work for us. Please send an invitation for whichever is best for your team.

All the best,
Trip

From: Boisvert, Caroline P. <cboisvert@axinn.com>

Sent: Monday, October 30, 2023 4:30 PM

To: Maier, Eric J. <emaier@kelloggghansen.com>; Thorne, John <jthorne@kelloggghansen.com>; Bird, Daniel G. <dbird@kelloggghansen.com>; Henningson, Sven E. (Trip) <shenningson@kelloggghansen.com>; Goodnow, Christopher C. <cgoodnow@kelloggghansen.com>; Sherrerd, Devon L. <dsherrerd@kelloggghansen.com>

Cc: Yung, Eva H. <eyung@axinn.com>; Haws, Claire L. <chaws@axinn.com>; Reiser, Craig M. <creiser@axinn.com>

Subject: [EXTERNAL] RE: Daily Mail v. Google -- MDL

Eric,

I am writing to follow-up on scheduling a meet-and-confer on Google's discovery requests directed to Daily Mail, which we have been trying to schedule since October 20. Given that your availability to speak with us changed between October 24 (when you suggested we speak on October 30 or 31) and when we followed up the next day, we want to get a call scheduled sooner than later so we do not face any additional scheduling delays. Please let us know if the times proposed in my email below work for you, and we would be happy to send around a calendar invitation to hold the time.

Best,
Caroline

Caroline P. Boisvert
Associate



Axinn, Veltrop & Harkrider LLP
90 State House Square
Hartford, CT 06103
Office 860.275.8129
Fax 860.275.8101
cboisvert@axinn.com
Axinn.com

Pronouns | She, Her, Hers

From: Boisvert, Caroline P.

Sent: Friday, October 27, 2023 3:11 PM

To: 'Maier, Eric J.' <emaier@kelloggghansen.com>; Thorne, John <jthorne@kelloggghansen.com>; Bird, Daniel G. <dbird@kelloggghansen.com>; Henningson, Sven E. (Trip) <shenningson@kelloggghansen.com>; Goodnow, Christopher C. <cgoodnow@kelloggghansen.com>; Sherrerd, Devon L. <dsherrerd@kelloggghansen.com>

Cc: Yung, Eva H. <eyung@axinn.com>; Haws, Claire L. <chaws@axinn.com>; Reiser, Craig M. <creiser@axinn.com>

Subject: RE: Daily Mail v. Google -- MDL

Eric,

Here is our availability for those dates:

Nov. 6 at 11:30am

Nov. 6 at 3pm

Nov. 7 at 10am

Nov. 7 at 1pm

Please let us know what works on your end and we will send a calendar invite.

Best,
Caroline

From: Maier, Eric J. <emaier@kelloggghansen.com>

Sent: Friday, October 27, 2023 2:09 PM

To: Boisvert, Caroline P. <cboisvert@axinn.com>; Thorne, John <jthorne@kelloggghansen.com>; Bird, Daniel G. <dbird@kelloggghansen.com>; Henningson, Sven E. (Trip) <shenningson@kelloggghansen.com>; Goodnow, Christopher C. <cgoodnow@kelloggghansen.com>; Sherrerd, Devon L. <dsherrerd@kelloggghansen.com>

Cc: Yung, Eva H. <eyung@axinn.com>; Haws, Claire L. <chaws@axinn.com>; Reiser, Craig M. <creiser@axinn.com>

Subject: RE: Daily Mail v. Google -- MDL

Caution:External Email

Caroline,

October 30 and 31 no longer work for us. We are available on November 6 or 7. Just let us know what times work for your team on those days.

Eric

Eric J. Maier

Kellogg, Hansen, Todd, Figel, & Frederick, P.L.L.C.

1615 M Street, N.W. | Suite 400 | Washington, DC 20036 | (202) 326-7923

NOTICE: This transmission is intended only for the use of the addressee and may contain information that is privileged, confidential and exempt from disclosure under applicable law. If you are not the intended recipient, or the employee or agent responsible for delivering the message to the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please notify the sender immediately via reply e-mail, and then destroy all instances of this communication. Thank you.

From: Boisvert, Caroline P. <cboisvert@axinn.com>

Sent: Friday, October 27, 2023 2:07 PM

To: Maier, Eric J. <emaier@kellogghansen.com>; Thorne, John <jthorne@kellogghansen.com>; Bird, Daniel G. <dbird@kellogghansen.com>; Henningson, Sven E. (Trip)

<shenningson@kellogghansen.com>; Goodnow, Christopher C. <cgoodnow@kellogghansen.com>;

Sherrerd, Devon L. <dsherrerd@kellogghansen.com>

Cc: Yung, Eva H. <eyung@axinn.com>; Haws, Claire L. <chaws@axinn.com>; Reiser, Craig M.

<creiser@axinn.com>

Subject: [EXTERNAL] RE: Daily Mail v. Google -- MDL

Eric,

Please let us know when you would like to meet & confer next week based on the availability provided in my email below.

Best,
Caroline

Caroline P. Boisvert

Associate



Axinn, Veltrop & Harkrider LLP

90 State House Square

Hartford, CT 06103

Office 860.275.8129

Fax 860.275.8101

cboisvert@axinn.com

Axinn.com

Pronouns | She, Her, Hers

From: Boisvert, Caroline P.

Sent: Wednesday, October 25, 2023 11:11 AM

To: 'Maier, Eric J.' <emaier@kellogghansen.com>; Thorne, John <jthorne@kellogghansen.com>;

Bird, Daniel G. <dbird@kellogghansen.com>; Henningson, Sven E. (Trip) <shenningson@kellogghansen.com>; Goodnow, Christopher C. <cgoodnow@kellogghansen.com>; Sherrerd, Devon L. <dsherrerd@kellogghansen.com>

Cc: Yung, Eva H. <eyung@axinn.com>; Haws, Claire L. <chaws@axinn.com>; Reiser, Craig M. <creiser@axinn.com>

Subject: RE: Daily Mail v. Google -- MDL

Eric,

Thank you for your email. Responding only on scheduling and your request for an agenda, please find our availability and proposed items for discussion below:

Availability

- Monday, Oct. 30 at 10am
- Tuesday, Oct. 31 at 10am
- Tuesday, Oct. 31 at 3pm

Agenda Items

- Sufficiency of Daily Mail's May 15 set of proposed search terms and custodians
- Daily Mail's efforts to produce documents to date
- Sufficiency of Daily Mail's initial disclosures
- Sufficiency of Daily Mail's responses to interrogatories, including Google's clarification of ROG 16

Best,
Caroline

From: Maier, Eric J. <emaier@kellogghansen.com>

Sent: Tuesday, October 24, 2023 3:06 PM

To: Boisvert, Caroline P. <cboisvert@axinn.com>; Thorne, John <jthorne@kellogghansen.com>; Bird, Daniel G. <dbird@kellogghansen.com>; Henningson, Sven E. (Trip) <shenningson@kellogghansen.com>; Goodnow, Christopher C. <cgoodnow@kellogghansen.com>; Sherrerd, Devon L. <dsherrerd@kellogghansen.com>

Cc: Yung, Eva H. <eyung@axinn.com>; Haws, Claire L. <chaws@axinn.com>; Reiser, Craig M. <creiser@axinn.com>

Subject: RE: Daily Mail v. Google -- MDL

Caution:External Email

Caroline,

Daily Mail is available to meet and confer on Monday or Tuesday of next week. We are generally available, so please let us know some times that work for you.

Daily Mail and Google have met and conferred on several occasions to discuss Google's discovery requests. During our meet and confers, we primarily have discussed the search terms Daily Mail will run over the documents it has collected as well as Google's interrogatories and Daily Mail's responses. While those discussions were ongoing, Daily Mail has made four separate productions totaling nearly 58,000 pages and over 1.3 terabytes of data. And Daily Mail responded to 30 interrogatories – more than are allowed under the federal rules or the orders governing this case. Following our last meet and confer, there were several outstanding issues.

Search Terms

Google proposed search terms on May 12 and Daily Mail made its counterproposal of search terms and custodians on May 15. On May 23, we provided hit counts for Google's proposed search terms showing that Google's proposal was unreasonable. Google's terms hit on nearly every document that Daily Mail had at that point collected. Although Daily Mail's initial search term proposal was sufficient, it agreed on July 17 to add an additional 19 Google-proposed search terms – nearly half of all of the terms Google proposed. We explained that Daily Mail's search protocol (as augmented on July 17) was more than sufficient. We asked that, if Google disagreed, Google explain why. Google has not done so.

During our August 10 meet and confer, we again asked that Google explain why Daily Mail's search protocol was insufficient. Google did not specify why Daily Mail's search protocol was insufficient. Instead, Google asked that Daily Mail provide a hit report that deduplicates as against documents already in Daily Mail's review population. We also stated that if Google wished to propose alternative search terms, Daily Mail would consider that proposal. Google has not proposed any alternative search terms.

Daily Mail is willing to provide a hit report that deduplicates against documents already in its review population if Google will do the same for the search terms proposed by MDL plaintiffs regarding their first set of requests for production as well as any future search terms plaintiffs propose. Please confirm by Friday whether Google agrees to this reciprocal arrangement.

Interrogatories

Daily Mail has responded to 30 interrogatories, 5 more than Google was permitted to serve under the Federal Rules or the discovery orders governing this case. At our meet and confer on August 10, we discussed Google's requested supplementation of several interrogatories. Daily Mail agreed to supplement its response to Interrogatory 7 and will further agree to supplement its responses to Interrogatories 24 and 25.

At the August 10 meet and confer, Google agreed to clarify in writing its request that Daily Mail supplement its response to Interrogatory 16. Google has not done so. Please provide that clarification prior to any meet and confer, and by Friday at the latest.

Next Meet and Confer

In light of the extensive meet and confers that have already taken place between Daily Mail and Google, we want to ensure that any future meet and confer does not re-tread old ground. If you would like to meet on Monday or Tuesday, please provide by Friday an agenda of the specific issues you would like to discuss.

All the best,

Eric

Eric J. Maier

Kellogg, Hansen, Todd, Figel, & Frederick, P.L.L.C.

1615 M Street, N.W. | Suite 400 | Washington, DC 20036 | (202) 326-7923

NOTICE: This transmission is intended only for the use of the addressee and may contain information that is privileged, confidential and exempt from disclosure under applicable law. If you are not the intended recipient, or the employee or agent responsible for delivering the message to the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please notify the sender immediately via reply e-mail, and then destroy all instances of this communication. Thank you.

From: Boisvert, Caroline P. <cboisvert@axinn.com>

Sent: Friday, October 20, 2023 3:57 PM

To: Maier, Eric J. <emaier@kellogghansen.com>; Thorne, John <jthorne@kellogghansen.com>; Bird, Daniel G. <dbird@kellogghansen.com>; Henningson, Sven E. (Trip) <shenningson@kellogghansen.com>; Goodnow, Christopher C. <cgoodnow@kellogghansen.com>; Sherrerd, Devon L. <dsherrerd@kellogghansen.com>

Cc: Yung, Eva H. <eyung@axinn.com>; Haws, Claire L. <chaws@axinn.com>; Reiser, Craig M. <creiser@axinn.com>

Subject: [EXTERNAL] RE: Daily Mail v. Google -- MDL

Counsel,

We would like to schedule a meet and confer regarding Google's discovery requests to Daily Mail. Please let us know your availability next week.

Best,
Caroline

Caroline P. Boisvert

Associate



Axinn, Veltrop & Harkrider LLP
90 State House Square
Hartford, CT 06103
Office 860.275.8129

Fax 860.275.8101
cboisvert@axinn.com
Axinn.com

Pronouns | She, Her, Hers

From: Baskin, Josh <jbaskin@wsgr.com>
Sent: Thursday, October 19, 2023 11:24 AM
To: Maier, Eric J. <emaier@kelloggghansen.com>; Thorne, John <jthorne@kelloggghansen.com>; Bird, Daniel G. <dbird@kelloggghansen.com>; Henningson, Sven E. (Trip) <shenningson@kelloggghansen.com>; Goodnow, Christopher C. <cgoodnow@kelloggghansen.com>; Sherrerd, Devon L. <dsherrerd@kelloggghansen.com>
Cc: Yung, Eva H. <eyung@axinn.com>; Haws, Claire L. <chaws@axinn.com>; Boisvert, Caroline P. <cboisvert@axinn.com>; Reiser, Craig M. <creiser@axinn.com>; Shariff, Baasil <bshariff@wsgr.com>; Evans-Aziz, Mikaela <mevansaziz@wsgr.com>
Subject: Daily Mail v. Google -- MDL

Caution:External Email

Eric and team,

I want to introduce you to the team at Axinn who will be taking over from us with respect to negotiations on discovery vis-à-vis Daily Mail in the MDL case.

Eva, Claire, Caroline, and Craig are ccd here.

It was a pleasure working with you on this.

Regards,

Josh Baskin
Wilson Sonsini Goodrich & Rosati, P.C.
One Market Plaza | Spear Tower Suite 3300
San Francisco, CA 94105
Direct: (415) 947-2160
E-mail: jbaskin@wsgr.com

This email and any attachments thereto may contain private, confidential, and privileged material for the sole use of the intended recipient. Any review, copying, or distribution of this email (or any attachments thereto) by others is strictly prohibited. If you are not the intended recipient, please contact the sender immediately and permanently delete the original and any copies of this email and any attachments thereto.

Notice: The information contained in this electronic mail and any attached documents from

Axinn, Veltrop & Harkrider LLP is confidential. This email may be an attorney-client communication, and as such is privileged and confidential. If you are not the intended recipient, be aware that any disclosure, copying, distribution or use of the content of this information is prohibited. If you have received this electronic mail in error, please notify us immediately by telephone (212) 728-2200/(860) 275-8100 or by reply electronic mail to the sender. IRS Circular 230 disclosure: To ensure compliance with requirements imposed by the IRS, we inform you that any U.S. federal tax advice contained in this communication (including any attachments) is not intended or written to be used, and cannot be used, for the purpose of (i) avoiding penalties under the Internal Revenue Code or (ii) promoting, marketing or recommending to another party any transaction or matter addressed herein.

Notice: The information contained in this electronic mail and any attached documents from Axinn, Veltrop & Harkrider LLP is confidential. This email may be an attorney-client communication, and as such is privileged and confidential. If you are not the intended recipient, be aware that any disclosure, copying, distribution or use of the content of this information is prohibited. If you have received this electronic mail in error, please notify us immediately by telephone (212) 728-2200/(860) 275-8100 or by reply electronic mail to the sender. IRS Circular 230 disclosure: To ensure compliance with requirements imposed by the IRS, we inform you that any U.S. federal tax advice contained in this communication (including any attachments) is not intended or written to be used, and cannot be used, for the purpose of (i) avoiding penalties under the Internal Revenue Code or (ii) promoting, marketing or recommending to another party any transaction or matter addressed herein.

Notice: The information contained in this electronic mail and any attached documents from Axinn, Veltrop & Harkrider LLP is confidential. This email may be an attorney-client communication, and as such is privileged and confidential. If you are not the intended recipient, be aware that any disclosure, copying, distribution or use of the content of this information is prohibited. If you have received this electronic mail in error, please notify us immediately by telephone (212) 728-2200/(860) 275-8100 or by reply electronic mail to the sender. IRS Circular 230 disclosure: To ensure compliance with requirements imposed by the IRS, we inform you that any U.S. federal tax advice contained in this communication (including any attachments) is not intended or written to be used, and cannot be used, for the purpose of (i) avoiding penalties under the Internal Revenue Code or (ii) promoting, marketing or recommending to another party any transaction or matter addressed herein.

Notice: The information contained in this electronic mail and any attached documents from Axinn, Veltrop & Harkrider LLP is confidential. This email may be an attorney-client communication, and as such is privileged and confidential. If you are not the intended recipient, be aware that any disclosure, copying, distribution or use of the content of this information is prohibited. If you have received this electronic mail in error, please notify us immediately by telephone (212) 728-2200/(860) 275-8100 or by reply electronic mail to the sender. IRS Circular 230 disclosure: To ensure compliance with requirements imposed by the IRS, we inform you that any U.S. federal tax advice contained in this communication (including any attachments) is not intended or written to be used, and cannot be used, for the purpose of (i) avoiding penalties under the Internal Revenue Code or (ii) promoting, marketing or recommending to another party any transaction or matter addressed herein.

Google's Proposed Custodians and Search Terms to Daily Mail¹

Proposed Custodians

- Matthew Wheatland
- Richard Caccappolo
- Adam Leslie
- Jesus Mendez
- Donna Ogier
- Feifan Chen
- Hannah Buitekant
- Jacqui Feng
- Jeremy Gan
- Tom Pickworth
- Henry Thomas
- Noah Szubski
- Lord Rothermere/Jonathan Harmsworth
- Alison Hennessy
- Alice Ting
- Lauren Dick
- Paul Zwillenburg
- Robin Raven
- Jonas Hermans
- Neil Finlayson
- Carly Steven
- Martin Clarke
- Jim Norton
- Shivali Best

¹ Please note that this proposal is subject to further additions based on review of produced documents and ongoing negotiations.

Proposed Search Terms

Search String	Hit Count
("business plan" OR strateg* OR forecast* OR roadmap OR "financial statement" OR (allocat* w/3 inventory)) w/10 ("Ad tech" OR "Display Advertising" OR DoubleClick OR "Double Click" OR "Double-Click" OR DFP OR "Ad Manager" OR GAM OR "Ad Exchange" OR AdX OR "Ad X" OR "Ad Server" OR "Demand Side Platform" OR "Demand-Side Platform" OR DSP OR "Header Bidding" OR HB)	
(presentation* OR deck* OR ((business OR exec*) w/3 (plan* OR summar*)) OR (board w/3 material*) OR strateg* OR decision* OR SWOT OR analy* OR inventory) w/10 ("Ad tech" OR "Display Advertising" OR DoubleClick OR "Double Click" OR "Double-Click" OR DFP OR "Ad Manager" OR GAM OR "Ad Exchange" OR AdX OR "Ad X" OR "Ad Server" OR "Demand Side Platform" OR "Demand-Side Platform" OR DSP OR "Header Bidding" OR HB OR inventory OR "in-app" OR "in app")	
(stud* OR analy* OR report* OR decision* OR presentation* OR deck* OR record* OR (board w/3 material*)) w/5 (advertis* OR revenue* OR earning* OR profit* OR subscrib* OR reader* OR visit* OR audience* OR employ* OR staff OR consultant* OR agenc* OR auction* OR "programmatic direct" OR traffic OR paywall OR monetiz* OR output OR impression* OR newspaper OR print)	
((("display advertising" OR "print advertising") w/5 (format* OR channel* OR publish* OR "ad tech" OR "adtech" OR revenue* OR cost* OR effect* OR target* OR yield* OR desktop* OR mobile* OR "app display" OR television*)) w/10 (study* OR analy* OR report* OR presentation* OR deck* OR record* OR compar*))	
((cost w/2 benefit) OR CBA OR analys* OR switch* OR RFP OR contract* OR proposal* OR viab* OR compar* OR justif*) w/10 (pric* OR quality OR feature* OR effective* OR better OR worse OR *advantage* OR sale* OR benefit* OR yield OR transparency OR protection* OR integration OR usage)	
("33 Across" OR Aarki OR AdColony OR Adelphic OR Adform OR Adyoulike OR Aerserv OR Amobee OR Arkheus OR Beamly OR "Chocolate Platform" OR Connatix OR "Conversant UAM" OR "Convert Media" OR Criteo OR DistrictM OR EMX OR Finc3 OR Fisherman OR Fluct OR Freewheel OR "Google AdExchange" OR GumGum OR iCrossing OR InMobi OR InSKin OR Kargo OR Kayzen OR LoopMe OR Magnite OR Media.net OR Mediabong OR "Millennial Media" OR Mindshare OR Mintegral OR "Minute Media" OR MobFox OR MobileFuse OR Moloco OR Mopub OR "My Intelligence" OR MyCode OR Nativo OR Ogury OR Omniture OR OneTag OR OpenWeb OR OpenX OR Outbrain OR Ozone OR PGAM OR Playwire OR "Pub Ventures" OR PubMatic OR Pulsepoint OR Regital OR Remixd OR RhythmOne OR "Rise Interactive" OR Sharethrough OR ShowHeroes OR Simpli.fi OR Smaato OR "Smart Adserver" OR Smartclip OR Sonobi OR Sovrn OR SpotX OR	

Search String	Hit Count
Taboola OR Teads OR Telaria OR Mediagrid OR TripleLift OR Tubemogal OR Videobeat OR Videology OR Vidible OR Wunderkind OR Xandr OR Xaxis OR YieldMO OR (advert* w/10 (Amazon OR Avid OR Beachfront OR Collective OR Concept OR Direct OR Facebook OR "Improve Digital" OR Index OR Infolinks OR "Just Premium" OR "Legacy Data" OR Liftoff OR "Kimberly Clark" OR Oath OR Playground OR Sortable OR Undertone OR Verve OR "Visible Measure" OR Yahoo))	
(stud* OR analy* OR report* OR presentation* OR deck* OR experiment* OR decision* OR latency OR problem* OR cost* OR (bid* w/3 duplic*) OR privacy OR fraud* OR malware* OR integrat* OR setup OR (set* w/3 up) OR complaint* OR issue* OR (board w/3 material*)) w/5 ("Header Bidding" OR HB or "client-side" OR "client side" OR "server-side" OR "server side")	
("display advertising") w/10 (factor OR cost OR effective* OR yield) w/10 (format OR channel)	
(develop* OR launch* OR licens* OR feature* OR pric* OR interopera* OR SWOT OR (strength* w/2 weakness*) OR cost* OR fee* OR discount* OR "take rate*" OR alternative* OR "switch*") w/5 ("Ad Tech" OR "ad server" OR "ad exchange")	
((strateg* OR attract* OR win* OR increas* OR gain*) w/5 (advertiser* OR user* OR subscriber*)) AND (Meta OR Twitter OR LinkedIn OR Amazon)	
(develop* OR launch* OR licens* OR feature* OR pric* OR interopera* OR SWOT OR (strength* w/2 weakness*) OR cost* OR fee* OR alternative* OR transparency OR yield OR protection* OR integrat*) w/5 (ad* w/2 (sell* OR sale* OR tool*))	
(analy* OR stud* OR report* OR presentation* OR deck* OR slide*) w/10 ("direct transaction" OR "Ad Exchange" OR "Ad Network" OR "Publisher-Automated Transaction" OR "Programmatic" OR (remnant w/3 sale*))	
(Traffic OR Impression* OR visit* OR click* OR visib* OR algorithm*) w/10 (manipulate* OR gam* OR exploit* OR control* OR steer*)	
"News Carousel" w/5 (mobile* OR search* OR result* OR scroll* OR displace*)	
("Accelerated Mobile Pages" OR AMP) w/5 (require* OR "Google Discover" OR traffic OR incompatible* OR (ban* w/3 script))	
"Dynamic Allocation" OR EDA OR ((Poirot OR Elmo OR Bernanke) w/10 (Google OR Project)) OR "Dynamic Revenue" OR "Viewable CPM" OR VCPM OR (Auction w/10 Redact*) OR ("Line Item" w/10 (cap* OR limitation*)) OR "Unified Pricing Rules" OR UPR OR "Open Bidding" OR "Bid Data Transfer File" OR "Minimum Bid To Win"	

Search String	Hit Count
("Accelerated Mobile Pages" OR AMP OR (mobile w/2 (format* OR design* OR page*))) w/10 (comply* OR compliance OR conversion* OR profit* OR latency OR spam OR malware OR "header bidding")	
((User w/2 (identi* OR ID)) OR cookie* OR pixel* OR tag*) w/10 ("Ad tech" OR "Display Advertising" OR DoubleClick OR "Double Click" OR "Double-Click" OR DFP OR "Ad Exchange" OR AdX OR "Ad X" OR "Ad Server" OR "Demand Side Platform" OR "Demand-Side Platform" OR DSP OR revenue OR monetiz* OR strateg*)	
ad* w/5 (revenue* OR profit* OR business* OR strateg* OR plan* OR report*)	
revenue* w/3 (source* OR plan* OR business* OR strateg* OR presentation* OR report*)	
((content* OR article* OR piece* OR writing* OR video* OR media*) w/5 ("web page*" OR webpage OR app* OR mobile)) AND (stat* OR number* OR overview OR analytics OR metric*)	
(content* OR article* OR piece* OR writing* OR video* OR media*) AND (ad* w/3 (revenue* OR income* OR fee* OR cost* OR price*))	
((ad* w/3 (display OR channel OR desktop OR mobile OR web* OR app* OR television OR *TV)) AND (report* OR data OR analy* OR metric* OR cost* OR effect* OR target* OR yield* OR sale* OR stat* OR strength* OR SWOT OR consider*))	
("Private Marketplace" OR PMP) w/10 (quer* OR click* OR revenue* OR fee* OR bid* OR impression* OR user* OR monetiz*)	
Remnant w/3 sale*	
(Direct OR programmatic) w/10 (transaction* OR sale*)	
Programmatic w/10 (guarantee* OR premium* OR reserv*)	
(Dynamic w/3 (allocat* OR revenue* OR share*)) OR EDA	
(Project OR Google) w/3 (Bernanke OR Elmo OR Poirot)	
(Line w/5 cap*) AND (Google OR GAM OR publisher* OR ad*)	
"auction" w/5 (redact* OR Google OR GAM OR ad*)	
(unified w/3 pric*) AND (Google OR GAM OR publisher* OR ad*)	
bid* w/3 (open OR "data transfer" OR min*)	
"News Media Alliance" OR NMA	

Search String	Hit Count
("Google Display Network" OR GDN) AND (Adsense OR DFP OR DoubleClick)	
(profit* OR loss*) AND *manag*	
((ad* w/5 revenue*) OR profit*) AND (Ukraine OR Covid* OR corona* OR declin* OR reduc*)	
breach* w/10 privac*	
(contract* OR negotiat* OR propos* OR RFP OR complain*) w/10 ("Ad tech" OR "Display Advertising" OR DoubleClick OR "Double Click" OR "Double-Click" OR DFP OR "Ad Manager" OR GAM OR "Ad Exchange" OR AdX OR "Ad X" OR "Ad Server" OR "Demand Side Platform" OR "Demand-Side Platform" OR DSP OR "Header Bidding" OR HB OR inventory OR "in-app" OR Google)	
(cost* OR expens* OR profit* OR revenue OR spend* OR fee) w/10 ("programmatic" OR (remnant w/3 sale*) OR impression* OR "Ad tech" OR "Display Advertising" OR DoubleClick OR "Double Click" OR "Double-Click" OR DFP OR "Ad Manager" OR GAM OR "Ad Exchange" OR AdX OR "Ad X" OR "Ad Server" OR "Demand Side Platform" OR "Demand-Side Platform" OR DSP OR "Header Bidding" OR HB OR inventory OR "in-app")	
(user w/3 privacy) AND ("display advertising")	
(calculat* OR stud* OR analy* OR report* OR presentation* OR deck* OR record* OR (board w/3 material*)) w/10 (overcharge OR loss* OR reduc* OR damag* OR harm*)	
("DOJ" OR "Department of Justice" OR ".gov" OR SEC OR "Securities and Exchange Commission" OR government OR FTC OR "Federal Trade Commission") AND ("Ad tech" OR "Display Advertising" OR DoubleClick OR "Double Click" OR "Double-Click" OR DFP OR "Ad Manager" OR GAM OR "Ad Exchange" OR AdX OR "Ad X" OR "Ad Server" OR "Demand Side Platform" OR "Demand-Side Platform" OR DSP OR "Header Bidding" OR HB OR inventory OR "in-app")	
(document* OR record* OR messag* OR chat* OR file*) w/5 (retain* OR retention* OR preserv* OR maintain*)	
(discov* OR investigat* OR litigat* OR claim* OR affidavit* OR declaration* OR alleg* OR subpoena*) AND ("Ad tech" OR "Display Advertising" OR DoubleClick OR "Double Click" OR "Double-Click" OR DFP OR "Ad Manager" OR GAM OR "Ad Exchange" OR AdX OR "Ad X" OR "Ad Server" OR "Demand Side Platform" OR "Demand-Side Platform" OR DSP OR "Header Bidding" OR HB OR inventory OR "in-app" OR Google)	